

Communications Consumer Panel and ACOD response to Ofcom's consultation on its proposed Disability Action Plan for Northern Ireland

The Communications Consumer Panel (the Panel) and the Advisory Committee for Older and Disabled People (ACOD) welcome the opportunity to respond to this consultation on Ofcom's proposed Disability Action Plan for Northern Ireland.

The Panel works to protect and promote people's interests in the communications sector, including the postal sector. We are an independent statutory body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and microbusinesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Response

The Panel has taken an active role in advising and supporting Ofcom's work in Northern Ireland, highlighting measures that communications providers can take to provide better customer service for their disabled consumers and flagging issues that present barriers for the participation of some disabled people in the telecoms sector.

Inclusive Communications

In December 2015, following publication of Ofcom's '*Disabled consumers' use of communications services*' (paragraph 4.9 of the consultation document) the Panel published independent qualitative research, '*Inclusive Communications*'¹. Ofcom's mystery shopping exercise² provided a useful snapshot of the availability and promotion of services at a particular time, across communications providers, to people with specific needs. Our research then provided deeper insight, in the form of a study into the experiences of 41 disabled and older consumers in the UK, pinpointing some of the barriers encountered by those consumers in the communications sector, in the preceding 12 months.

¹ <http://www.communicationsconsumerpanel.org.uk/research-and-reports/we-re-not-all-the-same-inclusive-communications>

² https://www.ofcom.org.uk/__data/assets/pdf_file/0019/82054/disability_charts_2015.pdf

The recommendations we made can be found here:

<http://www.communicationsconsumerpanel.org.uk/research-and-reports/we-re-not-all-the-same-inclusive-communications>

As a follow-up to our publication, the Panel and Ofcom engaged with stakeholders in Northern Ireland and other nations in March 2016 to raise awareness both of disabled consumers' needs and the Panel's recommendations, and to seek good practice that could be shared to raise standards. At the same event, the Panel and Ofcom promoted the Ofcom-led UKRN guide for consumers and citizens: *'Essential Services: getting extra help'* (paragraph 4.11 of the consultation document), where it was highlighted that a Northern Ireland-specific version would be beneficial. We welcome the fact that Ofcom is leading on this version and that completion of the guide is expected in 2017 as an action under this Plan.

The Panel also advised and worked with Ofcom and stakeholders from the communications sector and other sectors, on *'A guide to publicising services available to disabled people'*³ published by Ofcom in August 2016.

Access Services

The Panel has recently commissioned UK-wide quantitative and qualitative research into the availability and quality of subtitles, signing and audio description ("Access Services"), which will include a Northern Ireland sample. We believe that viewers and listeners with hearing or sight impairments should be able to enjoy both broadcast TV and on-demand programme services.

Culture and awareness

We believe it is vital that Ofcom sets a high standard and leads by example when encouraging the promotion of diversity, equality and equality of opportunity in its stakeholders - including broadcasters, where on screen portrayal of disabled people and older people is such an important issue. We therefore recognise the importance of having an internal working group to involve Ofcom colleagues in managing the organisation's approach to being "disability smart" - as well as Ofcom's Single Equality Scheme (paragraphs 4.2 and 4.4 of the consultation document).

We strongly support the roll-out of unconscious bias training and disability awareness training for people managers at Ofcom and disability awareness and Disability Action Plan training to employees based in Northern Ireland. If not already in place, we would recommend that records of such training are maintained and that the training is refreshed regularly.

³ https://www.ofcom.org.uk/__data/assets/pdf_file/0015/81132/guidance.pdf

We also welcome the intent to gain insights into the reach of advertising for Ofcom and its Advisory Committee roles, by asking applicants where they saw the role advertised - and we support the promotion of guaranteed interviews for disabled applicants who meet the essential criteria of an advertised role.

Engagement

We strongly support the continued engagement with stakeholders representing disabled peoples' views; continuing to conduct research that includes the views and experiences of disabled people; and continued monitoring of complaints data to identify disability-related issues in complaints.

We would also welcome Ofcom's continued engagement with the Business Disability Forum and other organisations that promote disability awareness and standards and would urge Ofcom to continue to encourage its stakeholders to share good practice and raise standards across the sector.

We are encouraged to see that Ofcom has included website accessibility as an ongoing action and we highlight the need to maintain knowledge and keep pace with the devices and systems used by disabled people.

Summary

We support Ofcom's Disability Action Plan for Northern Ireland and will continue to actively engage in, and advise on, policies affecting disabled consumers and citizens in Northern Ireland.

We welcome the attention that the Plan gives to details such as recruitment to Ofcom and its Advisory Committees, training and employee awareness, listening to and engaging with disabled consumers and citizens and representative organisations, and accessibility of services.